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1	DLA PIPER RUDNICK GRAY CARY US LLP
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5	Attorneys for Plaintiffs
	SAFE Financial LLC, a Delaware limited
6	liability company, and SSC Service Corp.,
	a California corporation
7	1
8	UNITED STATE
-	GIVITED STITLE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

SAFE FINANCIAL LLC, a Delaware limited liability company, and SSC SERVICE CORP., a California corporation,

Plaintiffs,

VS.

PERIMETER SECURITY SOLUTIONS, L.L.C., a Georgia limited liability company, and ROBERT H. SMITH, an individual,

Defendants.

Case No. C 04-04084 MJJ ARB

STIPULATION TO CONTINUE DEADLINE TO COMPLETE MEDIATION AND CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER

Date: August 16, 2005

Time: 2:00 p.m.

Place: Courtroom 11, 19th Floor Judge: Hon. Martin J. Jenkins

The parties to the above-entitled action jointly submit this Stipulation and request the Court to adopt it as its Order in this case.

Pursuant to the Court's March 15, 2005 Pretrial Order and ADR Local Rule 6-4(b), the deadline to conduct a mediation was June 14, 2005, and a further Case Management Conference is scheduled for August 16, 2005. However, due to scheduling conflicts involving counsel, the parties, and the mediator, the parties were unable to conduct the mediation by June 14, 2005. The parties have agreed to participate in a mediation on September 13, 2005 at 10:00 a.m. Since conducting a further Case Management Conference prior to the mediation would be premature, the parties also agree to a continuance of the further Case Management Conference to a convenient date in October 2005.

1	DATED: June <u>21</u> , 2005	DLA PIPER RUDNICK GRAY CARY US LLP			
2		Λ . Ω			
3		By: Jamie S. Peterson			
4		Attorneys for Plaintiffs SAFE Financial LLC, a Delaware limited liability			
5		company, and SSC Service Corp., a California corporation			
6		Corporation			
7	DATED: June, 2005	VALINOTI & DITO			
8					
9		By: Kenneth L. Valinoti			
10		Attorneys for Defendants Perimeter Security Solutions, a Georgia limited			
11		liability company, and Robert H. Smith			
12	DATED: June, 2005	LAW OFFICES OF MARCUS D. MERCHASIN			
13					
14		By:			
15 16		Marcus D. Merchasin Attorneys for Third-Party Defendant			
17		Dean Cromer			
18	CASE MAI	NACEMENT ORDER			
19	CASE MANAGEMENT ORDER The parties shall participate in and complete their mediation no later than September				
20		16, 2005. The further Case Management Conference in this action, currently scheduled for August			
21	16, 2005, is hereby continued to October, 2005, at 2 p.m. in Courtroom 11.				
22	IT IS SO ORDERED.				
23					
24	DATED:				
25		Hon. MARTIN J. JENKINS United States District Court Judge			
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	STIPULATION FOR CONTINUANCE	-2-			

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	5			SAFE Financial LLC, a Delaware I company, and SSC Service Corp., a corporation			
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	7 8	DATED: June_	<u>~</u> 2005	VALI	NOTI & DITO		
	9				Kenneth L. Valinoti Attorneys for Defendants		
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1	DATED: June, 2005	DLA PIPER RUDNICK GRAY CARY US LLP			
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3		By:			
4		Jamie S. Peterson Attorneys for Plaintiffs SAFE Financial LLC, a Delaware limited liability			
5 6		company, and SSC Service Corp., a California corporation			
7	DATED: June, 2005	VALINOTI & DITO			
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9		Ву:			
10		Kenneth L. Valinoti Attorneys for Defendants			
11		Perimeter Security Solutions, a Georgia limited liability company, and Robert H. Smith			
12	72 444				
13	DATED: June <u>20</u> , 2005	LAW OFFICES OF MARCUS D. MERCHASIN			
14		By:			
15		Marcus D. Merchasin Attorneys for Third-Party Defendant			
16		Dean Cromer			
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18		ASE MANAGEMENT ORDER			
19		rticipate in and complete their mediation no later than September			
20	16, 2005. The further Case Management Conference in this action, currently scheduled for August				
21	16, 2005, is hereby continued to October 18, 2005, at 2 p.m. in Courtroom 11.				
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23		Indage Martin 1, Jenkins			
24	DATED: 6/23/2005	Hon. MARTIN J. JENKINS			
25		United States District Court Judge			
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